

May 7, 2004

Elizabeth Moran  
Manager Ethylbenzene Panel  
American Chemistry Council  
1300 Wilson Boulevard  
Arlington, VA 22209

Dear Ms. Moran:

The Office of Pollution Prevention and Toxics is transmitting EPA's comments on the robust summaries and test plan for Polyethylbenzene Bottoms posted on the ChemRTK HPV Challenge Program Web site on January 8, 2004. I commend the Ethylbenzene Panel for its commitment to the HPV Challenge Program.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

EPA has reviewed this submission and has reached the following conclusions:

1. Physicochemical Properties and Environmental Fate. EPA agrees with the test plan for these endpoints. Technical discussions provided for certain endpoints (e.g., photodegradation) need to be provided in robust summary format. EPA recommends the use of a Level III fugacity model.
2. Health Effects. EPA agrees with the test plan for these endpoints.
3. Ecological Effects. EPA agrees with the test plan for these endpoints. However, if the log Kow is 4.2 or greater the submitter needs to consider a chronic test in daphnia instead of the acute toxicity tests.

EPA will post this letter on the HPV Challenge Web site within the next few days. We ask that the Ethylbenzene Panel advise the Agency, within 60 days of this posting on the Web site, of any modifications to its submission. Please send any electronic revisions or comments to the following e-mail addresses: oppt.ncic@epa.gov and chem.rtk@epa.gov.

If you have any questions about this response, please contact Richard Hefter, Chief of the HPV Chemicals Branch, at 202-564-7649. Submit questions about the HPV Challenge Program through the "Contact Us" link on the HPV Challenge Program Web site pages or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at tsca-hotline@epa.gov.

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

-S-

Oscar Hernandez, Director  
Risk Assessment Division

Enclosure

cc: W. Penberthy  
M. E. Weber